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IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

BRANT William Jacoby

Full name and prison name of
Plaintiff(s)

v.

WARDEN Thompson, Warden
LAMAR, MR. TURNER (Mental
Health), Officer CRIMES and
Officer Boynes, MS. Vitor
(Mental Health)

Name of person(s) who violated your
constitutional rights. (List the names
of all the person.)

CIVIL ACTION NO. 2:22-CV-0696-MHT-CSC
(To be supplied by Clerk of U.S. District
Court)

Imminent Danger Claim

Jury Trial Demanded

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ☐ No ☒
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ☒ NO ☒
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) See Back of Page:

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the county)

I Have 3 strikes ALREADY under the
Prison Litigation Reform ACT and CAN ONLY
File Imminent Danger Claims

- 82-09-31-22-21
- #1) Jacoby V. Carter et.al, #2:19-CV-01067 (MDAL)
Still pending
 - #2) Jacoby V. Gordy et.al, #2:21-CV-0723 (MDAL)
Still pending
 - #3) Jacoby V. Gordy et.al, #2:22-CV-393 (MDAL)
Still pending
 - #4) Jacoby V. ~~Chambers~~ et.al, #2:22-CV-0411 (MDAL)
Still pending
 - #5) Jacoby V. Wexford Health et.al, #2:21-CV-00170 (MDAL)
Still pending
 - #6) Jacoby V. A1 DOC. et.al, #2:22-CV-0391 (MDAL)
(Still pending)
 - #7) Jacoby V. Jeff Dunn et.al, #2:21-CV-843
(MDAL) (Still pending)
 - #8) Jacoby V. Dunn et.al, #2:21-CV-344 (MDAL)
Still pending
 - #9) Jacoby V. West et.al, #2:21-CV-0831 (MDAL)
Still pending

3. Docket number _____
4. Name of judge to whom case was assigned _____
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) _____
6. Approximate date of filing lawsuit _____
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT Bullock Corr. Fac.
104 Bullock Drive Union Springs AL 36089
 PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Bullock

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

| | NAME | ADDRESS |
|----|-------------------------|-------------------------------|
| 1. | <u>WARDEN CAMAR</u> | <u>Bullock Corr. Fac.</u> |
| 2. | <u>WARDEN THOMPkins</u> | <u>104 Bullock Drive</u> |
| 3. | <u>MR Turner</u> | <u>Union Springs AL 36089</u> |
| 4. | <u>OFFICER BOYNS</u> | <u>↓ ↓</u> |
| 5. | <u>OFFICER CRINES</u> | <u>↓ ↓</u> |
| 6. | <u>MS. Vittor</u> | |

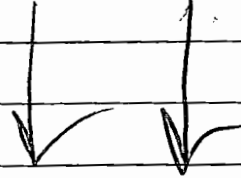
IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED October 26, 2022
UP TO November 10, 2022

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: See Attached
8th Amendment Claim for Failing to Protect.

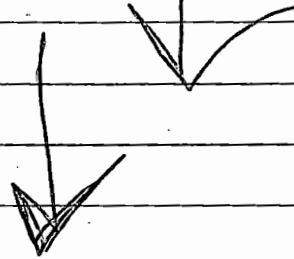
STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

See Attached



GROUND TWO: 8th Amendment ~~Claim~~ for
UNSAFE and Violent Prison Conditions

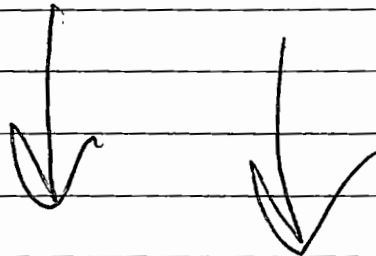
SUPPORTING FACTS: See Attached



GROUND THREE: 8th Amendment Claim for Deliberately
Failing to Follow Policies Rules and Regulations of
The ALABAMA Dept. of Corrections.

SUPPORTING FACTS:

See Attached



ON OR ABOUT November 1, 2022 while at Bullock Corr. fac. BRENT William Jacoby WAS IN E-1 Dorm sleeping on A Top Bunk Bed Second to last Bed From the BACK OF the DORM when he was Violently ASSAULTED in his sleep at Roughly 9:00 AM to 10:00 AM.

This began the start of Numerous assaults on Him IN A weeks period Dating From November 1, 2022 up to November 10th, 2022.

Everyday starting From November 1, 2022 JACOBY WAS Violently Assaulted And Tumped on by numerous inmates. sometimes 1 or 2 times a day IN E-1 Dorm and its all on the E-1 Dorm cameras. This Went on From November 1, 2022 and again on November 2nd, 3rd, 4th and on the 5th of November 2022 Until ABOUT 12:00 AM to 1:00 AM when Lt. Lynn got Jacoby out of E-1 Dorm And Sent Him to F-2 Dorm.

JACOBY Went on Suicide Watch to the Blue Building H-Dorm on or ABOUT October 26th, 2022 because he was having Issues IN General population WAS being extorted by inmates who wanted him to get on the cellphones and run credit card skits for them on Families in Society And stores. JACOBY didnt want to do this, he WAS still having A Hard Time With His mother's death and dealing With it mentally and dealing With His cancer issues and being Set off for parole for 5 more years.

MR. TURNER put JACOBY on Suicide Watch and came to the door and Verbally started Assaulting JACOBY With derogatory Racist Comments ABOUT him being "white" a "homosexual" and told JACOBY He doesnt Run Anything Around Here. Turner put JACOBY in a Cell that WAS Covered IN Another mans "SHit" "Feces" all over the Wall and Floor and would not get it cleaned before JACOBY WAS put in there. The cameras And mental observers IN H-Dorm Witnessed this, Recorded this and Documented this ON October 26th, 2022.

MR. TURNER deliberately moved Another inmate out of that Cell and knew it WAS Filthy With his "Feces" "SHit" all over it Just to put JACOBY IN there to SUFFER even more mental Anguish than he WAS already going through. MR TURNER said I Remember your Ass Tried to sue me years ago When I shot you up with drugs and IF you dont get off the door and lay down Im gonna shoot you up again. JACOBY and TURNER Had more derogatory words to one another and he said "im gonna Fix your Ass" and "HAVE you

beat up when you go back to population if you keep running your mouth". A few words were exchanged, Turner said "Sleep in Shift Till Monday" (October 31, 2022).

Jacoby slept in this contaminated cell until Sunday October 30, 2022 when a officer moved him to another cell.

Turner walked by Jacoby's new cell on Monday October 31, 2022 around 8:00am and released Jacoby to F-1 Dorm in population around 9:00am and told him to "Be SAFE"!!

Jacoby feels like Turner was behind all the violent assaults on him from November 1, 2022 up to ~~November~~ on or about November 4, 2022 around 11:00-11:59 pm and again in F-2 Dorm on or about November 10, 2022.

Even though Jacoby was assigned to F-1 Dorm on or about October 31, 2022 he could not get on his assigned bed because the inmate would not get off of it. Jacoby had to find a bed open in E-1 Dorm and beg the inmates to let him sleep there. That's why Jacoby was in E-1 Dorm. Half the population in Bullock is not on their assigned beds and roughly one fourth of the population isn't even in their assigned dorms.

Jacoby told officer Boynes and officer Crimes that inmates kept assaulting him while he was in E-1 Dorm and needed protective custody a couple of times between November 1, 2022 and November 4th, 2022. Officer Boynes and Crimes refused to contact the Shift Commanders and report the violent assaults on him and kept making Jacoby go back in the dorm and denying him protective custody. Jacoby is even seen running out the dorm bleeding and with bruises all over him begging for help and protection on the E-1 camera. And in the lobby/hallway, Crimes and Boynes denying him and forcing him back into the dorm.

Jacoby reported these assaults on the wall phone on the P.R.E.A. Hotline several times, and being scared for his life even saying Mr. Turner had a "hit" on him and was behind these violent assaults causing him 2 black eyes, busted lip and bruises all over his body.

turning him into A WALKING BRUISE. Between November 2nd and or the 10th 2022 Jacoby made roughly 5 or 6 calls on the Hotline to P.R.E.A. Reporting these inmates and Mr Turner.

Jacoby even told Mental Health Ms. Vittor whom is his Mental Health Case Worker And the P.R.E.A Compliance Managers Several times He needed protection didn't feel safe in population And Needed to be transferred because He felt Like MR. TURNER WAS Behind Him being Violently ASSAULTED. Jacoby even wrote statements For them but Again Ms. Vittor and the P.R.E.A compliance Manager Refused to protect Jacoby and have him Locked up and OR TRANSFERED.

Jacoby RAN out the Dorm of G-1 on or ABOUT November 4th 2022 Between Roughly 10:00 pm and 11:59 pm all the way to Medical After He was ASSAULTED by inmates Again. A Body Chart WAS Half done on Him and Again Jacoby WAS sent back to population to G-1 and Denied protective Custody. THE CAMERA IN G-1, the Hallways all the way to Medical and Medical prove this. Lt. Lynn WAS Nice enough to come Around Around 11:30 PM on Nov. 4th 2022 up to Around 12:30 AM November 5th 2022 and move Jacoby to F-2 Dorm to Find A Bed to get on And the CAMERAS PROVE this.

Jacoby Kept Reporting these Assaults on him to those defendants EVEN Warden Thompson But Again Warden Thompson Would not Put Jacoby IN protective Custody OR TRANSFER Him. Jacoby wrote Warden Thompson Warden Lamar and letters to Mental Health Reporting these Assault on him and making paper TRAILS But not One single Defendant protected him and All defendants HEREIN Were deliberately Indifferent to Jacoby's SAFETY, Wellbeing and Health and FAILED to protect him. All policies of A.I. D.O.C. Were Violated And not Followed pertaining to procedure to Follow When inmates ARE ASSAULTED by other inmates. Not one single defendant Followed policy by doing an Investigation, Writing disciplinary INFRACTIONS on these inmates, Looked at the CAMERAS and Locked Jacoby OR these inmates up pending A Investigation AND Hearing. All defendants continued to Violate Policies, continued to House

P340F5

JACOBY IN A UNSAFE ENVIRONMENT despite his pleas for help and protection and were deliberately indifferent towards his safety, well being and Health. All defendants were in cahoots in trying to cover these violent ASSAULTS ON JACOBY UP-ON OR ABOUT November 10, 2022 JACOBY was Again ASSAULTED IN F-2 Dorm OR ON November 9th 2022 At Roughly 9:00 AM to 1:00 PM and can be seen running through the Dorm and Showers trying to get away then again being punched on in the cage by another Inmate. Nobody would Tell him Why He kept getting violently ASSAULTED. Again on November 10th 2022 JACOBY told the PR-ET. COMPLIANCE MANAGER he felt Turner was behind it, MS Vittor and Warden Thompson. What was going on, wanted to press Charges, point all these inmates out to them and demanded protective Custody And to Talk to Investigations and Intelligence Division for the Alabama Dept. of Corrections. JACOBY wrote I and I for the A.D.O.C. two times About everything Herein and still No Response. Warden Thompson and Camar ARE not making sure officers are staying in the Dorms and making Rounds in the Dorms, to keep inmates SAFE and prevent these violent ASSAULTS. THE CAMERAS PROVE officer AREnt even Around and there ISnt even enough officers working these shifts at Bullock to keep inmates SAFE and to prevent most of the Violence especially to JACOBY. There ISnt even enough officers employed to Run the prison on each shift and this is the main cause of all the Violence and these Dorms Being so UNSAFE and Violent. THE CAMERAS PROVE this.

Its because of all these defendants deliberate Indifference to JACOBYs 8th Amendment Rights of the United STATES Constitution, Violating his Rights under the United STATES Constitution, Failure to Follow Policies, Failure

To PROTECT him and housing him in UNSAFE and Violent prison Conditions that Jacoby was subjected to cruel and unusual punishment, violently ASSAULTED and turned into a walking Brise and had to suffer physical pain and emotional distress

Jacoby was not protected as policy demands under the A.I.D.O.C. And everyday that he is housed at Bullock Corr. fac. his life will continue to be in Imminent Danger

Jacoby has wrote the Investigation and Intelligence Division twice already by mail and once through the P.R. & A Manager At Bullock Corr. fac. From on or about November 10 2022 up to on or about November 28th 2022 and Commissioner John Hamm of the A.I.D.O.C. For Help and to get copies of the Video Surveillance Cameras in the Dorm so that IT can be obtained for this court and as evidence for trial and so they can investigate everything Jacoby spoke about herein but to this day has yet to get a Response much less see them.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Award Punitive Damages against ^{All} Defendants in their Individual Capacities Jointly and Severally in the amount of \$500,000 ^{each} and \$3,000 ^a month every month for the rest of my life as long as I am in prison serving this Life Sentence until I am Released. I also want a Jury Trial

Signature of plaintiff(s)

Brent Jacoby

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 11-28-2022
(Date)

Signature of plaintiff(s)

Brent Jacoby

SWORN Declaration

I Brent Jacoby Declare Under the penalty of perjury I'm telling the truth herein and everything stated herein is Based on information I Believe to be true. I am over 18 years old.

11-28-2022

Respectfully Submitted
Brent Jacoby

Certificate of Service

I Brent Jacoby did on this 30th day of November 2022 give the lock up unit officers a copy of 1983 Action to be put in the prison mail box to be sent out to the United States Post Office for Delivery to; United States District Court One Church Street Suite 200 Montgomery AL 36104

11-30-2022

Brent Jacoby

BRENT JACOBY #291560
Bullock Corr. Inc.
104 Bullock Drive
Union Springs, AL 36089

Legal Mail

MONTGOMERY AL 360

9 DEC 2022 PM 2:11

FIRST-CLASS

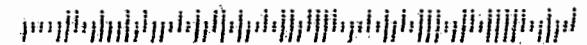


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Montgomery, AL 36104

36104-401801



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